

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NELLIE SAMPSON,

*on behalf of herself and all other employees similarly
situated,*

Plaintiffs,

v.

MEDISYS HEALTH NETWORK INC., THE JAMAICA
HOSPITAL, THE BROOKDALE HOSPITAL
MEDICAL CENTER, FLUSHING HOSPITAL AND
MEDICAL CENTER, PENINSULA HOSPITAL
CENTER, DAVID P. ROSEN, and MAX SCLAIR,

Defendants.
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ECF CASE

10 Civ. 1342 (SJF) (ARL)

**DECLARATION OF
MARGUERITE VERDI**

I, Marguerite Verdi, hereby declare as follows based on personal knowledge:

1. I am the Director of Human Resources for Jamaica Hospital Medical Center, Inc. ("Jamaica").
2. I have been employed by Jamaica as Director of Human Resources since June of 1996. As Director of Human Resources, I am familiar with certain of Jamaica's policies and practices with respect to labor and employee relations, compensation, benefits, human resources administration, staffing and corporate human resources support.
3. Jamaica is a non-profit, community-based hospital that employs approximately 3,000 individuals.
4. I have reviewed the Complaint in the above-captioned litigation, including plaintiff Nellie Sampson's ("Plaintiff") description of non-exempt Jamaica employees on whose behalf Plaintiff purports to bring this lawsuit on a class and collective action basis. Certain current or former Jamaica employees included in Plaintiff's description of putative class

members are members of different collective bargaining units represented by several labor unions that represent Jamaica employees.

5. The terms and conditions of employment for certain putative class members are governed by a number of different collective bargaining agreements ("CBA").

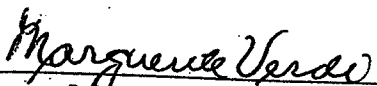
6. The terms and conditions of employment for some of the employees (current and former) in Plaintiff's putative class description are governed by the CBA between Jamaica Hospital Medical Center and the Committee of Interns and Residents/SEIU ("SEIU"). A true and accurate copy of the CBA currently in effect between Jamaica Hospital Medical Center and SEIU is attached as Exhibit A.

7. The terms and conditions of employment for other current or former of Jamaica employees included in the putative class description are governed by a CBA between Jamaica Hospital Medical Center/Jamaica Hospital Nursing Home – Trump Pavilion and 1199SEIU United Healthcare Workers East Registered Nurse Division ("SEIU, RN Division"). A true and accurate copy of the CBA currently in effect between Jamaica Hospital Medical Center/Jamaica Hospital Nursing Home – Trump Pavilion and SEIU, RN Division is attached as Exhibit B.

8. The terms and conditions of employment for members of a third group of putative class members units of Jamaica employees are governed by a CBA between Medisys Health Network (Jamaica Center) and Local 74. A true and accurate copy of the CBA currently in effect between Medisys Health Network (Jamaica Center) and Local 74 is attached as Exhibit C.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on July 20, 2010.


Marguerite Verdi